

Honorable Judge Jed S. Rakoff
United States District Court
Southern District of New York

Re: United States of America v. Suresh Munshani, 22cr215
Request to Appoint a Paralegal

Dear Judge Rakoff,

On April 13, 2022, I was appointed to represent Suresh Munshani under the Criminal Justice Act, 18 U.S.C. §3006A (“CJA”). I write to request the appointment of Stacey J. Clarke as a paralegal to assist with Mr. Munshani’s matter. I respectfully suggest that appointment of a paralegal would represent a cost saving measure to the Court and a time saving measure for counsel.

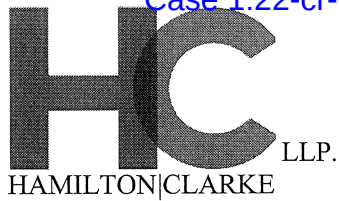
We expect the discovery in Mr. Munshani’s matter to be voluminous including, phone calls and texts, financial records and reports, and surveillance.

Ms. Stacey Clarke has over 7 years’ experience as a bilingual legal assistant. Ms. Clarke has researched and prepared documents for litigation, appeared on behalf of corporations in administrative matters, reviewed, translated, and prepared court documents as well as assisted in the preparation of correspondence between attorneys and the Courts. Ms. Clarke has assisted defense counsel and other attorneys on numerous cases in the past by converting, reviewing, and organizing discovery to prepare for Counsel. Ms. Clarke is fluent in Spanish and has assisted counsel in translating court documents as well as assisting in proffer prep with Spanish speaking clients. Ms. Clarke has also been the liaison between defense counsel and law enforcement agencies, attorneys, and medical providers for the purpose of obtaining case-related information.

In *United States v Darinso Marte Reyes 20-Cr.-022* (PAC), Ms. Clarke organized the discovery essential to Mr. Marte-Reyes, translated documents into Spanish from English, reviewed and translated phone calls from Spanish to English, assisted with translation during in person Jail visits to MCC/MDC and assisted Counsel in reviewing the documents.

In *United States v Darrius Sutton, 1:20-cr-00323* (AMD) Ms. Clarke assisted with reviewing phone calls, YouTube videos, police reports, medical records and surveillance videos as well as scheduling video calls, counsel visits, and preparing both digital and hard copies of discovery for review.

Ms. Clarke has also assisted defense counsel in *United States v. Miguel Gonzalez., 20 Cr. 507* (PAC) where Mr. Gonzalez was wrongfully charged and indicted on charges of conspiracy to distribute a controlled substance, and 2 counts of 924c. Mr. Gonzalez was facing a 15-year mandatory minimum on a case he was insistent he was innocent of. Ms. Clarke assisted defense counsel with reviewing numerous cell phones, videos, and pictures in prep for an innocence proffer that resulted in the US Attorney’s office dismissing all charges against Mr. Gonzalez.



MANAGING PARTNERS
Phillip C. Hamilton, Esq.
Lance A. Clarke, Esq.

A copy of Ms. Clarke's CV is attached to this letter for the Court's consideration. If the Court is inclined to grant this request, I respectfully request that Ms. Clarke be appointed at the paralegal rate of \$85 per hour for up to 100 hours given her ability to assist defense counsel in reviewing and organizing discovery for review with Mr. Munshani at an economical rate.

Lastly, the defense requests that this letter be filed under seal as there are strategic aspects of trial preparation which the government should not be privy to at this time.

Thank you for your consideration to this matter

May 9, 2022

Respectfully,

Lance A. Clarke

Lance A. Clarke

↑
None stated

→ *Appointment granted
but not under seal.*

SO ORDERED

[Signature]
JSJ
5-17-22